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*Attorneys for Defendant USAA Casualty General Indemnity Company*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**BREANNA REINGRUBER**, an  
individual,  
  
Plaintiff,

v.

**USAA GENERAL INDEMNITY  
COMPANY**, d/b/a USAA, an incorporated  
entity and/or a reciprocal insurance  
exchange; DOES 1 through X, and ROE  
CORPORATIONS I through X; inclusive,  
  
Defendants.

Civil Action No. 2:23-cv-00007-JCM-EJY

**STIPULATION AND ORDER TO  
EXTEND TIME DISCOVERY  
DEADLINES**

**(FIRST REQUEST)**

Defendant USAA General Indemnity Company (“USAA GIC”) and Plaintiff Breanna Reingruber (“Reingruber” or “Plaintiff” and together with USAA GIC collectively referred to as the “Parties”), by and through their respective undersigned counsel, hereby stipulate and agree to extend the current discovery deadlines set forth in the Scheduling Order entered on March 17, 2023 (ECF No. 20) pursuant to LR 26-3. This is the first stipulation to extend discovery deadlines.

A brief history of the action is below.

1. Plaintiff initiated the instant action on October 26, 2022, with the filing of a complaint in state court. (ECF No. 1). Plaintiff amended her complaint on December

5, 2022. (*Id.*). Defendant timely removed. (*Id.*). The amended complaint is the operative complaint in this matter. (*See* ECF No. 1-2).

2. The Parties filed a joint status report on February 3, 2023. (ECF No. 11).

3. The Parties filed a Proposed Joint Discovery Plan and Scheduling Order Submitted in Compliance with LR 26-1(b) on March 17, 2023. (ECF No. 19).

4. The Parties briefed a motion to dismiss plaintiff's first, third, and fourth causes of action and plaintiff's requests for punitive damages and attorney's fees, which the court granted in part and denied in part on July 21, 2023. (ECF Nos. 7 and 22).

5. The Parties have agreed to continue the discovery deadlines to participate in mediation with Trevor Atkin and to confirm if they can avoid the legal fees and costs associated with engaging experts.

6. As relevant to this extension, the scheduling order set the following deadlines:

- a. Discovery cutoff: October 17, 2023
- b. Amending the pleadings and adding parties: August 18, 2023
- c. Initial expert disclosures: August 18, 2023
- d. Rebuttal expert disclosures: September 18, 2023
- e. Interim status report: August 18, 2023
- f. Dispositive motions: November 16, 2023
- g. Pretrial order: December 15, 2023

7. The Parties request the deadlines set forth above be extended approximately 90 days as set forth below:

- a. Discovery cutoff: **January 15, 2024**
- b. Amending the pleadings and adding parties: **November 16, 2023**
- c. Initial expert disclosures: **November 16, 2023**
- d. Rebuttal expert disclosures: **December 18, 2023**
- e. Dispositive motions: **February 14, 2024**

g. Pretrial order: **March 14, 2024**

8. No parties will be prejudiced by this extension.

Dated this 2<sup>nd</sup> day of August, 2023.

**CLAGGETT & SYKES LAW FIRM**

**SPENCER FANE, LLP**

By: /s/ Brian Blankenship  
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*Attorneys for Plaintiff, Breanna  
Reingruber*

/s/ Mary E. Bacon  
Mary E. Bacon, Esq.  
(NV Bar No. 12686)  
*Attorneys for Defendant, USAA General  
Indemnity Company, d/b/a USAA*

**ORDER**

**IT IS SO ORDERED.**

**DATED:** August 3, 2023

  
UNITED STATES MAGISTRATE JUDGE